

Lois O. Rosenbaum, OSB No. 773250
lorosenbaum@stoel.com
STOEL RIVES LLP
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204
Telephone: (503) 224-3380
Facsimile: (503) 220-2480

Paul R. Bessette (Admitted *Pro Hac Vice*)
pbessette@kslaw.com
Michael J. Biles, (Admitted *Pro Hac Vice*)
mbiles@kslaw.com
James P. Sullivan, (Admitted *Pro Hac Vice*)
jsullivan@kslaw.com
KING & SPALDING LLP
401 Congress Avenue, Suite 3200
Austin, TX 78701
Telephone: (512) 457-2050
Facsimile: (512) 457-2100

Attorneys for Defendants Galena Biopharma, Inc.,
Ryan M. Dunlap, Remy Bernarda, and Mark Schwartz

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**In re GALENA BIOPHARMA, INC.
SECURITIES LITIGATION**

Case No.: 3:14-cv-00367-SI (Lead)
Related Cases: 3:14-cv-00389-SI
3:14-cv-00410-SI
3:14-cv-00435-SI
3:14-cv-00558-SI

STIPULATION FOR BRIEFING
SCHEDULE OF DEFENDANTS GALENA
BIOPHARMA, INC., RYAN M. DUNLAP,
MARK W. SCHWARTZ, REMY
BERNARDA, STEVEN KRIEGSMAN,
RICHARD CHIN, RUDOLPH NISI,
STEPHEN GALLIKER, SANFORD
HILLSBERG, AND MARK J. AHN

WHEREAS, on October 31, 2014, Lead Plaintiffs Kisok Cho, Anthony Kim, Pantelis Lavidas, and Joseph Buscema (“Lead Plaintiffs”) and Plaintiff Alan Theriault (collectively, the “Plaintiffs”) filed their Consolidated Class Action Complaint for Violations of the Federal Securities Laws (the “Complaint”) (Dkt. No. 59), naming as Defendants, among others, Galena Biopharma, Inc., Ryan M. Dunlap, Remy Bernarda, Mark Schwartz, Steven Kriegsman, Richard Chin, Rudolph Nisi, Stephen Galliker, Sanford Hillsberg, and Mark J. Ahn;

WHEREAS, on January 9, 2015, Defendants Galena Biopharma, Inc., Ryan M. Dunlap, Remy Bernarda, and Mark Schwartz (“Galena Defendants”) filed their motion to dismiss (Dkt. No. 82);

WHEREAS, on January 9, 2015, Defendants Steven Kriegsman, Richard Chin, Rudolph Nisi, Stephen Galliker, and Sanford Hillsberg (“Outside Director Defendants”) filed their motion to dismiss (Dkt. No. 80);

WHEREAS, on January 9, 2015, Defendants Mark J. Ahn filed his motion to dismiss (Dkt. No. 81);

WHEREAS, on August 5, 2015, the Court issued its Opinion and Order (Dkt. No. 149) granting in part and denying in part the Defendants’ motion to dismiss;

WHEREAS, the Court’s Opinion and Order, issued on August 5, 2015, granted Plaintiffs leave to file an amended complaint within 28 days from the date of the Opinion and Order;

WHEREAS, Plaintiffs do not intend to file an amended complaint;

WHEREAS, Plaintiffs, Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn (collectively, the “Parties”) are actively engaged in settlement discussions and believe that they are close to reaching a settlement agreement;

WHEREAS, the Parties agree that setting the deadline for Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn for November 30, 2015 will allow the parties to focus on negotiating a settlement agreement that will be presented to the Court for approval; and

WHEREAS, Plaintiffs, Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn have entered into a stipulation that Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn shall file and service their answer to the complaint by November 30, 2015.

NOW THEREFORE, it is agreed, subject to the approval of the Court, that:

1. Plaintiffs will not file an amended complaint as against Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn;
2. Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn shall file and service their answer to the complaint by November 30, 2015.

IT IS SO STIPULATED:

Dated: October 30, 2015

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

Laurence M. Rosen
lrosen@rosenlegal.com
Philip Kim, Esq.
pkim@rosenlegal.com
275 Madison Avenue, 34th Floor
New York, NY 10016
Telephone: 212-686-1060

Co-Lead Counsel for Lead Plaintiffs

POMERANTZ LLP

/s/ Patrick V. Dahlstrom _____

Patrick V. Dahlstrom
pdahlstrom@pomlaw.com
Leigh Handelman Smollar
lsmollar@pomlaw.com
10 S. LaSalle St. Ste. 3505
Chicago, IL 60603
Telephone: 212-661-1100

Co-Lead Counsel for Lead Plaintiffs

-and-

RANSOM GILBERTSON MARTIN
& RATLIFF, LLP
Jeffrey Ratliff
rgilbertson@qwestoffice.com
1500 NE Irving Street, Suite 412
Portland, Oregon 97232
Telephone: 503-226-3664

Liaison Counsel

PERKINS COIE LLP

/s/ Robert L. Aldisert _____

Robert L. Aldisert, OSB No. 940433
RAldisert@perkinscoie.com
Misha Isaak, OSB No. 086430
MIsaak@perkinscoie.com
1120 N.W. Couch Street, Tenth Floor
Portland, OR 97209-4128
Telephone: 503.727.2000

Counsel for Defendants Steven Kriegsman, Richard Chin, Rudolph Nisi, Stephen Galliker, and Sanford Hillsberg

ANGELI UNGAR LAW GROUP LLC

/s/ Kristen Tranetzki

Kristen Tranetzki, OSB No. 115730
kristen@angelilaw.com
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-3332

-and-

DEBEVOISE & PLIMPTON LLP
Jonathan R. Tuttle (Admitted *Pro Hac Vice*)
jrtuttle@debevoise.com
Scott N. Auby (Admitted *Pro Hac Vice*)
snauby@debevoise.com
555 13th Street NW, Suite 1100E
Washington, DC 20004
Telephone: (202) 383-8000

Counsel for Defendant Mark J. Ahn

STOEL RIVES LLP

/s/ Lois O. Rosenbaum

Lois O. Rosenbaum, OSB No. 773250
lorosenbaum@stoel.com
Stephen H. Galloway, OSB No. 093602
shgalloway@stoel.com
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204
Telephone: (503) 224-3380

-and-

KING & SPALDING LLP
Paul R. Bessette, (Admitted *Pro Hac Vice*)
pbessette@kslaw.com
Michael J. Biles, (Admitted *Pro Hac Vice*)
mbiles@kslaw.com
James P. Sullivan, (Admitted *Pro Hac Vice*)
jsullivan@kslaw.com
401 Congress Avenue, Suite 3200
Austin, TX 78701
Telephone: (512) 457-2050

*Counsel for Defendants Galena Biopharma, Inc.,
Ryan M. Dunlap, Remy Bernarda, and Mark
Schwartz*